

December 16, 2022

New Mexico Oil Conservation Division 1220 South St. Francis Drive Santa Fe, New Mexico 87505

Re: Closure Request Addendum
Grama 8817 JV-P Federal Com #2H
Incident Number nOY1704029358
Lea County, New Mexico

To Whom It May Concern:

Ensolum, LLC (Ensolum), on behalf of BTA Oil Producers, LLC (BTA), has prepared this *Closure Request Addendum* to document additional assessment, delineation, and soil sampling activities performed at the Grama 8817 JV-P Federal Com #2H (Site). The purpose of the additional Site assessment, delineation, and soil sampling activities was to address a denial of the *Closure Request* submitted on behalf of BTA on January, 23, 2017 (and subsequently on November 20, 2021). Based on the delineation activities completed following the denial and laboratory analytical results from the soil sampling events, BTA is submitting this *Closure Request Addendum*, describing follow-up remediation that has occurred and requesting closure for Incident Number nOY1704029358.

SITE DESCRIPTION AND RELEASE SUMMARY

The Site is located in Unit M, Section 16, Township 22 South, Range 34 East, in Lea County, New Mexico (32.385229° N, 103.481830° W) and is associated with oil and gas exploration and production operations on State Land.

On January 11, 2017, a fine mist of oil was released from the top of the separator, resulting in the release of approximately 5 barrels (bbls) of oil onto pasture directly adjacent to the battery, with none recovered. BTA reported the release immediately to the New Mexico Oil Conservation Division (NMOCD) on January 11, 2017 and submitted a *Release Notification Form C-141* (Form C-141) on February 9, 2017. The release was assigned Incident Number nOY1704029358.

On January 12, 2017, a contractor was hired to oversee remediation of the release extent and confirm to impacts remained in place. A *Closure Request* was submitted January 23, 2017, detailing the remediation and bio-amendment application. NMOCD responded on September 15, 2022, denying the *Closure Request* for the following reasons:

- Please include a scaled diagram that shows the potentially impacted area, significant surface
 features including roads and site infrastructure, location of borings, sample points, monitoring
 wells and subsurface features such as known pipelines to the extent known at the time of
 submittal including the source of information regarding subsurface features.
- The C-141 closure report submitted on 11/10/2021 states "The release is located on top of a historical pit area. Remediation activities will be addressed at time of pit reclamation." If the pit has been reclaimed, please provide a closure report including information regarding the

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remediation of the release. If the pit has not been reclaimed and a deferral request needs to be submitted, page 5 of the C-141 must be completed. A deferral will only be approved if all conditions are met per 19.15.29 NMAC.

The following *Revised Closure Addendum* provides scaled diagrams showing significant Site receptors, Site infrastructure and boring locations and details remediation activities completed at the Site. In addition, a desktop search was conducted to confirm the presence or absence of a historical pit area mentioned in the original *Closure Report*. Results of the desktop are included below..

SITE CHARACTERIZATION AND CLOSURE CRITERIA

The Site was characterized to assess the applicability of Table I, Closure Criteria for Soils Impacted by a Release, of Title 19, Chapter 15, Part 29 (19.15.29) of the New Mexico Administrative Code (NMAC). Results from the characterization desktop review are presented on page 3 of the Form C-141, Site Assessment/Characterization. Potential site receptors are identified on Figure 1.

Depth to groundwater at the Site is estimated to be greater than 100 feet below ground surface (bgs) based on the nearest groundwater well data. The closest permitted groundwater well with depth to groundwater data is New Mexico Office of the State Engineer (NMOSE) well CP-00865 POD 1, located approximately 0.8 miles southwest of the Site. The groundwater well has a reported depth to groundwater of 605 feet bgs and a total depth of 885 feet. This depth to water measurement is consistent with regional data that indicates groundwater is greater than 100 feet bgs and is present between 180 feet and 824 feet bgs. All wells used for depth to water determination are depicted on Figure 1 and the referenced well records are included in Appendix A.

The closest continuously flowing or significant watercourse to the Site is a playa lake, located approximately 22,634 feet northeast of the Site. The Site is greater than 200 feet from a lakebed, sinkhole, or playa lake and greater than 300 feet from an occupied residence, school, hospital, institution, church, or wetland. The Site is greater than 1,000 feet to a freshwater well or spring and is not within a 100-year floodplain or overlying a subsurface mine. The Site is not underlain by unstable geology (low potential karst designation area). Site receptors are identified on Figure 1.

Based on the results of the Site Characterization, the following NMOCD Table I Closure Criteria (Closure Criteria) apply:

- Benzene: 10 milligrams per kilogram (mg/kg)
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX): 50 mg/kg
- Total petroleum hydrocarbons (TPH)- gasoline range organics (GRO) and TPH-diesel range organics (DRO): 1,000 mg/kg
- TPH: 2,500 mg/kg
- Chloride: 20,000 mg/kg

A reclamation requirement of 600 mg/kg chloride and 100 mg/kg TPH was applied to the top 4 feet of the pasture area that was impacted by the release, per NMAC 19.15.29.13.D (1) for the top 4 feet of areas that will be reclaimed following remediation.



SITE ASSESSMENT ACTIVITIES AND ANALYTICAL RESULTS

Based on the time that has lapsed since the initial Closure Request was submitted (over five years), BTA tasked Ensolum to assess the historical release to determine if bio-remediation was effective at reducing hydrocarbon impacts to meet the Site Closure Criteria and reclamation requirements.

On October 06, 2022, Ensolum personel were at the Site to evaluate the release extent based on information provided on the Form C-141 and visual observations. Three assessment soil samples (SS01 through SS03) were collected within the release extent and four assessment soil samples (SS04 through SS07) at a depth of approximately 0.5 feet bgs to assess shallow soil conditions in and around the historical release. The preliminary soil samples were field screened for volatile organic compounds (VOCs) utilizing a calibrated photoionization detector (PID) and chloride utilizing Hach® chloride QuanTab® test strips. The soil sample locations were mapped utilizing a handheld Global Positioning System (GPS) unit and are depicted on Figure 2. Photographic documentation was completed during the Site visit and a photographic log is included in Appendix B.

The soil samples were placed directly into pre-cleaned glass jars, labeled with the location, date, time, sampler name, method of analysis, and immediately placed on ice. The soil samples were transported at or below 4 degrees Celsius (°C) under strict chain-of-custody procedures to Cardinal Laboratories (Cardinal) in Hobbs, New Mexico, for analysis of the following chemicals of concern (COCs): BTEX following United States Environmental Protection Agency (EPA) Method 8021B; TPH-GRO, TPH-DRO, and TPH-oil range organics (ORO) following EPA Method 8015M/D; and chloride following EPA Method SM4500.

Laboratory analytical results for preliminary soil samples SS01 through SS07, collected within the release extent, indicated all COC concentrations were compliant with the Closure Criteria; however, additional delineation activities were warranted.

DELINEATION ACTIVITIES AND ANALYTICAL RESULTS

On October 25, 2022, Ensolum personnel were at the Site to perform delineation activities. Three boreholes (BH01 through BH03) were advanced via hand-auger within the pasture release extent. Three discrete delineation soil sample was collected in each location at depth ranging from 1-foot to 5.5 feet bgs. Soil from the delineation samples was field screened for VOCs and chloride. The soil samples were handled and assessed in a similar manner described above. The boreholes were backfilled with soil removed. The delineation soil sample locations are depicted in Figure 2. A photographic log is included in Appendix B. Lithologic / Soil Sampling Logs are provided in Appendix C.

Laboratory analytical results for delineation soil samples BH01 through BH03, indicated all COC concentrations were compliant with the most stringent Table I Closure Criteria. Laboratory analytical results are summarized in Table 1 and the complete analytical reports are included as Appendix D.

HISTORICAL PIT ASSESSMENT

Ensolum reviewed files on the NMOCD Permitting and Imaging online portals as well as an pertinent records BTA had for the Site. One closed loop system was permitted at the Site (1 @ 30-025-42808) and approved of by NMOCD in 2015. No other records of any current or historical reserve pits were found during the desktop search. It should be noted that BTA did not have any records of a reserve pit associated with this Site.



Looking through historical imagery of the Site on Google Earth did identify disturbed soil north of the Site starting in 2005. As imagery was reviewed for years 2005, 2009, 2011, 2012, 2014, and 2017, Ensolum did not identify the presence of a reserve pit within the disturbed area. It appears the area was potentially graded for a future production well and/or battery to be constructed; however, it was never used and as such, the area appears to have been reclaimed.

Ensolum believes the previous consultant viewed the historical imagery and assumed it was a former reserve pit without any documentation. Based on the lack of documents and physical observations of a reserve pit north of the Site and in the vicinity of release associated with Incident Number nOY1704029358, it appears there was no historical reserve pit and the release should be addressed on its own as has been completed and described in the previous section.

CLOSURE REQUEST

Site assessment and delineation activities were conducted at the Site to assess the effectiveness of remedial actions, specifically the addition of bio-amendments to residual crude oil within the release extent, that addressed the January 2017 crude oil release. Laboratory analytical results for preliminary and delineation soil samples, collected from the pasture area, indicated all COC concentrations were compliant with the Site Closure Criteria and reclamation requirements. In addition, no evidence of the historical pit mentioned in the original *Closure Request* was observed during the delineation activities and no documentation of the historical pit could be found in NMOCD or BTA records. Based on the soil sample analytical results, no further remediation appears to be required.

Depth to groundwater has been estimated to be greater than 100 feet bgs and no other sensitive receptors were identified near the release extent. BTA believes these remedial actions are protective of human health, the environment, and groundwater. As such, BTA respectfully requests closure for Incident Number nOY1704029358. The Form C-141 is included as Appendix F.

If you have any questions or comments, please contact Ms. Tacoma Morrissey at (337) 257-8307 or tmorrissey@ensolum.com.

Sincerely, **Ensolum**, **LLC**

Hadlie Green Staff Geologist Tacoma Morrissey Senior Geologist

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cc: Bob Hall, BTA Oil Producers, LLC

State Land Office

Appendices:

Figure 1 Site Receptor Map

Figure 2 Delineation Soil Sample Locations
Table 1 Soil Sample Analytical Results
Appendix A Referenced Well Records

Appendix B Photographic Log

Appendix C Lithologic Soil Sampling Logs

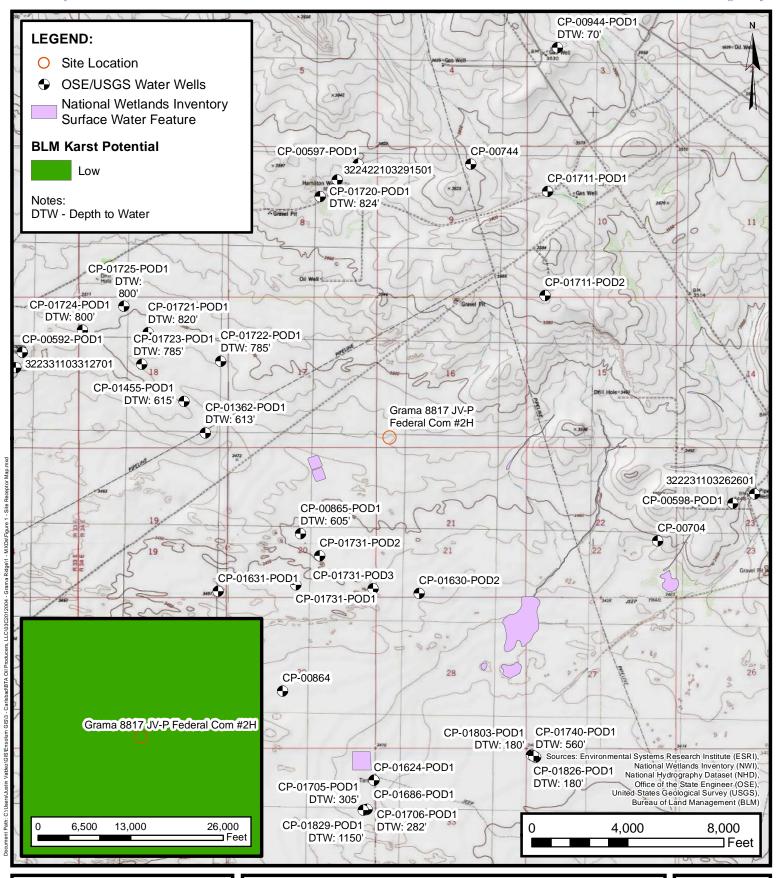
Appendix D Laboratory Analytical Reports & Chain-of-Custody Documentation

Appendix E NMOCD Sample Notification

Appendix F Final C-141



FIGURES

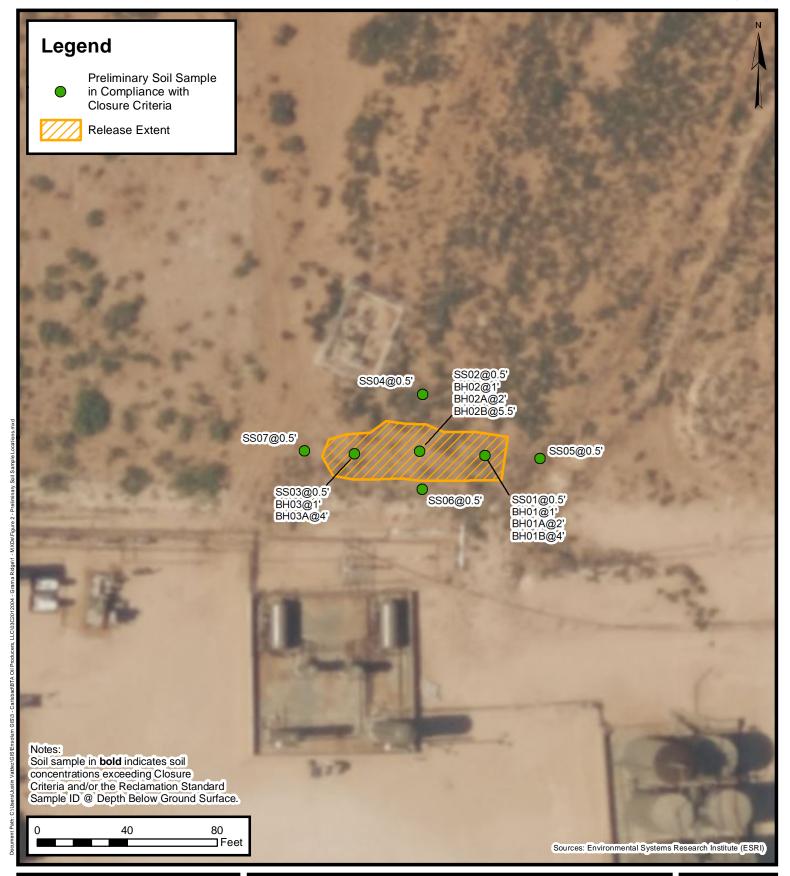




Site Receptor Map

BTA Oil Producers, LLC Grama 8817 JV-P Federal Com #2H nOY1704029358 Unit M, Sec 16, T22S, R34E Lea County, New Mexico FIGURE

1





Preliminary Soil Sample Locations

BTA Oil Producers, LLC Grama 8817 JV-P Federal Com #2H nOY1704029358 Unit M, Sec 16, T22S, R34E Lea County, New Mexico **FIGURE**

2



TABLES



TABLE 1 SOIL SAMPLE ANALYTICAL RESULTS Grama 8817 JV-P Federal Com #2H BTA Oil Producers, LLC Lea County, New Mexico

Sample I.D.	Sample Date	Sample Depth (feet bgs)	Benzene (mg/kg)	Total BTEX (mg/kg)	TPH GRO (mg/kg)	TPH DRO (mg/kg)	TPH ORO (mg/kg)	GRO+DRO (mg/kg)	Total TPH (mg/kg)	Chloride (mg/kg)
NMOCD Table 1 C	losure Criteria (NMAC 19.15.29)	10	50	NE	NE	NE	1,000	2,500	20,000
				Delin	neation Soil Sar	nples				
SS01	10/06/2022	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	16.0
BH01	10/25/2022	1	<0.050	<0.300	<10.0	11.2	<10.0	11.2	11.2	16.0
BH01A	10/25/2022	2	< 0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	<16.0
BH01B	10/25/2022	4	< 0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	<16.0
SS02	10/06/2022	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	32.0
BH02	10/25/2022	2	< 0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	<16.0
BH02A	10/25/2022	4	< 0.050	<0.300	<10.0	23.9	<10.0	23.9	23.9	<16.0
BH02B	10/25/2022	5.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	64.0
SS03	10/06/2022	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	<16.0
BH03	10/25/2022	1	<0.25	<0.150	<10.0	<10.0	<10.0	<10.0	<10.0	<16.0
BH03A	10/25/2022	4	<0.25	<0.150	<10.0	<10.0	<10.0	<10.0	<10.0	<16.0
SS04	10/06/2022	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	16.0
SS05	10/06/2022	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	32.0
SS06	10/06/2022	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	16.0
SS07	10/06/2022	0.5	<0.050	<0.300	<10.0	<10.0	<10.0	<10.0	<10.0	32.0

Notes:

bgs: below ground surface mg/kg: milligrams per kilogram

NMOCD: New Mexico Oil Conservation Division

BTEX: Benzene, Toluene, Ethylbenzene, and Xylenes

Concentrations in bold exceed the NMOCD Table 1 Closure Criteria or reclamation standard where applicable.

GRO: Gasoline Range Organics

DRO: Diesel Range Organics

ORO: Oil Range Organics

TPH: Total Petroleum Hydrocarbon

Ensolum 1 of 1



APPENDIX A

Referenced Well Records



New Mexico Office of the State Engineer

Point of Diversion Summary

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest)

(NAD83 UTM in meters)

Well Tag **POD Number** Q64 Q16 Q4 Sec Tws Rng

 \mathbf{X}

CP 00865 POD1

3 20 22S 34E

641845 3583118

Driller License: 421 **Driller Company:** GLENN'S WATER WELL SERVICE

Driller Name: GLENN, CLARK A."CORKY" (LD)

Drill Start Date: 08/22/1997

Drill Finish Date: 08/29/1997

Plug Date: Source:

Shallow

Pump Type:

Log File Date:

09/04/1997 **SUBMER**

PCW Rcv Date: 10/18/2013 Pipe Discharge Size: 2.875

Estimated Yield: 50 GPM

Casing Size:

6.63

Depth Well:

885 feet

Depth Water:

605 feet

Water Bearing Stratifications:

Top Bottom Description

738

870 Sandstone/Gravel/Conglomerate

Casing Perforations:

Bottom Top

734

800

Meter Make:

885

SEAMETRICS

Meter Serial Number: 062018004760

Meter Multiplier:

1.0000

Number of Dials:

Meter Type:

Diversion

Unit of Measure: Usage Multiplier:

Meter Number:

Barrels 42 gal.

Return Flow Percent:

Reading Frequency:

Quarterly

Meter Readings (in Acre-Feet)

Read Date	Year	Mtr Reading	Flag	Rdr	Comment	Mtr Amount (Online
08/27/1999	1999	12170	A	fm		0	
09/27/1999	1999	18665	A	fm		1.993	
07/10/2000	2000	23573	A	mb	Initial reading Trn# 184947	0	
09/01/2000	2000	792	A	mb	Initial reading Trn# 189706	0	
10/09/2000	2000	3703	A	mb	Final reading Trn# 189706	0.893	
11/02/2000	2000	33323	A	mb	Final reading Trn# 184947	2.992	
07/23/2001	2001	35004	A	jw		9.606	
08/14/2001	2001	35550	A	jw		0.168	
09/16/2003	2004	44365	A	RPT		0	
02/13/2004	2004	54105	A	RPT		2.989	
05/28/2013	2013	301812	A	RPT	Initial reading	0	
10/07/2013	2013	494174	A	RPT		24.794	
11/11/2013	2013	627789	A	RPT		17.222	
01/01/2014	2014	775387	A	ap		1902.439	
04/01/2014	2014	1150295	A	ap		4832.312	
10/01/2014	2014	1395310	A	ap		3158.078	
01/01/2015	2015	2252908	A	ap		11053.861	
03/31/2015	2015	2496573	A	ap		3140.678	
06/01/2015	2015	2602349	A	ap		1363.381	
06/30/2015	2015	2632913	A	ap		393.949	

**YTD Met	er Amounts:	Year		Amount
11/30/2018	2018	443361	A	ap
09/30/2018	2018	201617	A	ap
08/30/2018	2018	73947	A	ap
08/13/2018	2018	0	A	ap
08/13/2018	2018	4791140	A	ap
07/31/2018	2018	4790998	A	ap
06/29/2018	2018	4790998	A	ap
06/01/2018	2018	4766177	A	ap
04/30/2018	2018	4658071	A	ap
03/30/2018	2018	4547266	A	ap
02/28/2018	2018	4511456	A	ap
01/30/2018	2018	4423832	A	ap
12/30/2017	2017	4326964	A	ap
11/30/2017	2017	4191565	A	ap
10/31/2017	2017	4063882	A	ap
07/31/2017	2017	3902575	A	ap
05/31/2017	2017	3857500	A	ap
05/01/2017	2017	3799022	A	ap
03/31/2017	2017	3670149	A	ap
03/02/2017	2017	3549664	A	ap
02/01/2017	2017	3505049	A	ap ap
12/01/2016	2016	3504124	A	ap ap
12/01/2016	2016	3400370	A	ap
10/31/2016	2016	3233850	A A	ap
09/01/2016 09/30/2016	2016 2016	3112223 3233850	A	ap
07/30/2016	2016	3039470	A	ap
06/01/2016	2016	2949111	A	ap
04/30/2016	2015	2902402	A	ap
11/30/2015	2015	2813732	A	ap
10/30/2015	2015	2777793	A	ap
09/30/2015	2015	2685784	A	ap
08/31/2015	2015	2675935	A	ap
07/28/2015	2015	2657713	A	ap

319.655
234.869
126.947
1185.934
463.230
1142.897
602.048
1164.667
937.737
1567.690
990.880
1155.451
1337.319
11.923
575.057
1552.971
1661.086
753.742
580.986
2079.139
1645.748
1745.202
1248.563
1129.414
461.567
1428.202
1393.414
319.926
0
1.830
0
953.127
1645.580
3115.917

**YTD Meter Amounts:	Year	Amount
	1999	1.993
	2000	3.885
	2001	9.774
	2004	2.989
	2013	42.016
	2014	9892.829
	2015	19425.401
	2016	7755.792
	2017	10605.854
	2018	11697.540
	2019	0

2020

Meter Number:806Meter Make:MASTERMeter Serial Number:1746627Meter Multiplier:100.0000

0

Number of Dials: 6 **Meter Type:** Diversion

Unit of Measure: Gallons **Return Flow Percent: Usage Multiplier: Reading Frequency:**

Meter Readings (in Acre-Feet)

Rdr Comment Mtr Reading Flag Mtr Amount Online **Read Date** Year 01/01/1999 1999 0 12165 A fm 01/15/1999 1999 2.915 21665 A fm **YTD Meter Amounts: Year **Amount**

2.915 **Meter Number:** 807 Meter Make: SEAMETRICS

Meter Serial Number: 10 200 191 Meter Multiplier: 1.0000 **Number of Dials: Meter Type:** Diversion

Unit of Measure: Return Flow Percent: Barrels 42 gal.

1999

Usage Multiplier: Reading Frequency: Monthly

Meter Readings (in Acre-Feet)

_		· · · · · · · · · · · · · · · · · · ·			
Read Date	Year	Mtr Reading	Flag	Rdr Comment	Mtr Amount Online
11/14/1999	1999	19858	A	fm	0
12/14/1999	1999	21411	A	fm	0.477
01/02/2019	2018	556195	A	RPT	0
02/01/2019	2019	604855	A	RPT	6.272
08/01/2019	2019	949138	A	RPT	44.376
09/01/2019	2019	1061141	A	RPT	14.436
09/30/2019	2019	1161966	A	RPT	12.996
10/31/2019	2019	1259879	A	RPT	12.620
11/30/2019	2019	1325382	A	RPT	8.443
12/31/2019	2019	1325382	A	RPT	0
02/01/2020	2020	1369756	A	RPT	5.720
03/01/2020	2020	1488098	A	RPT	15.253
04/01/2020	2020	1488098	A	RPT	0
05/01/2020	2020	1488098	A	RPT	0
06/01/2020	2020	1488098	A	RPT	0
08/01/2020	2020	1488098	A	RPT	0
08/01/2020	2020	0	A	RPT	0
09/01/2020	2020	154	A	RPT	0.020
10/01/2020	2020	154	A	RPT	0
11/01/2020	2020	26213	A	WEB	3.359 X
12/01/2020	2020	144137	A	WEB	15.200 X
01/01/2021	2020	168842	A	WEB	3.184 X
01/31/2021	2021	204704	A	ad	0
02/24/2021	2021	250418	A	ad	5.892
02/24/2021	2021	0	A	ad	0
02/28/2021	2021	479	A	ad	0.062
03/31/2021	2021	77494	A	ad	9.927
04/30/2021	2021	151907	A	ad	9.591
05/31/2021	2021	260155	A	ad	13.952
06/30/2021	2021	350984	A	ad	11.707

390794	Α	ad	5 131	
465926	A	ad	9.684	
584055	A	ad	15.226	
664994	A	ad	10.432	
756770	A	ad	11.829	
835364	A	ad	10.130	
933170	A	ad	12.607	
933713	A	ad	0.070	
933713	A	ad	0	
1158640	A	ad	28.992	
1158640	A	ad	0	
1158640	A	ad	0	
1448406	A	ad	37.349	
1448406	A	ad	0	
1458546	A	WEB	1.307	X
1615601	A	WEB	20.243	X
Year		Amount		
1999		0.477		
2018		0		
2019		99.143		
2020		42.736		
2021		113.563		
2022		100.568		
	584055 664994 756770 835364 933170 933713 1158640 1158640 1448406 1448406 1458546 1615601 • Year 1999 2018 2019 2020 2021	465926 A 584055 A 664994 A 756770 A 835364 A 933170 A 933713 A 933713 A 1158640 A 1158640 A 1448406 A 1448406 A 1458546 A 1615601 A * Year 1999 2018 2019 2020 2021	465926 A ad 584055 A ad 664994 A ad 756770 A ad 835364 A ad 933170 A ad 933713 A ad 933713 A ad 1158640 A ad 1158640 A ad 1448406 A ad 1448406 A ad 1448406 A WEB 1615601 A WEB E Year Amount 1999 0.477 2018 0 2019 99.143 2020 42.736 2021 113.563	465926 A ad 9.684 584055 A ad 15.226 664994 A ad 10.432 756770 A ad 11.829 835364 A ad 10.130 933170 A ad 12.607 933713 A ad 0.070 933713 A ad 0.070 933713 A ad 0.070 9158640 A ad 0.0158640 A ad 0.0158640 A ad 0.0148406 A ad 0.0148406 A ad 0.01488546 A WEB 1.307 1615601 A WEB 20.243 E Year Amount 1999 0.477 2018 0 2019 99.143 2020 42.736 2021 113.563

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, or suitability for any particular purpose of the data.

11/11/22 8:54 AM

POINT OF DIVERSION SUMMARY



APPENDIX B

Photographic Log



Photographic Log BTA Oil Producers, LLC. Grama Ridge Federal #2H Incident Number: nOY1704029358

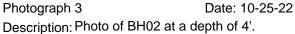


Photograph 1 Date: 10-25-22

Description: Photo of lines approaching release facing Northwest.

Photograph 2 Date: 10-25-22 Description: Photo of the source of release facing Northwest.





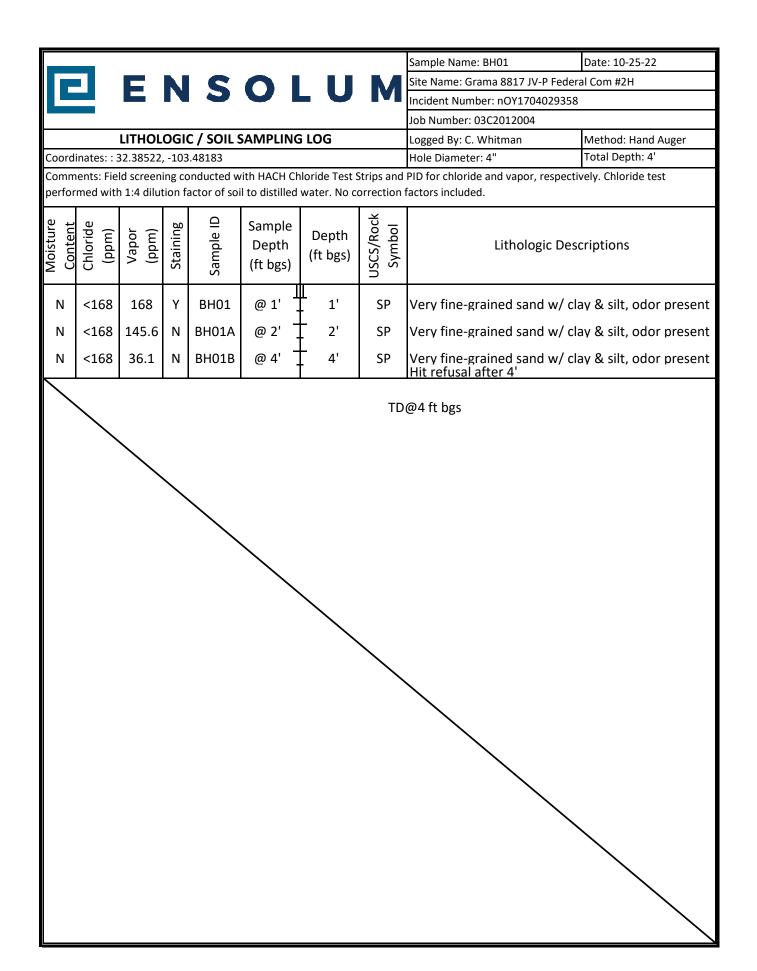


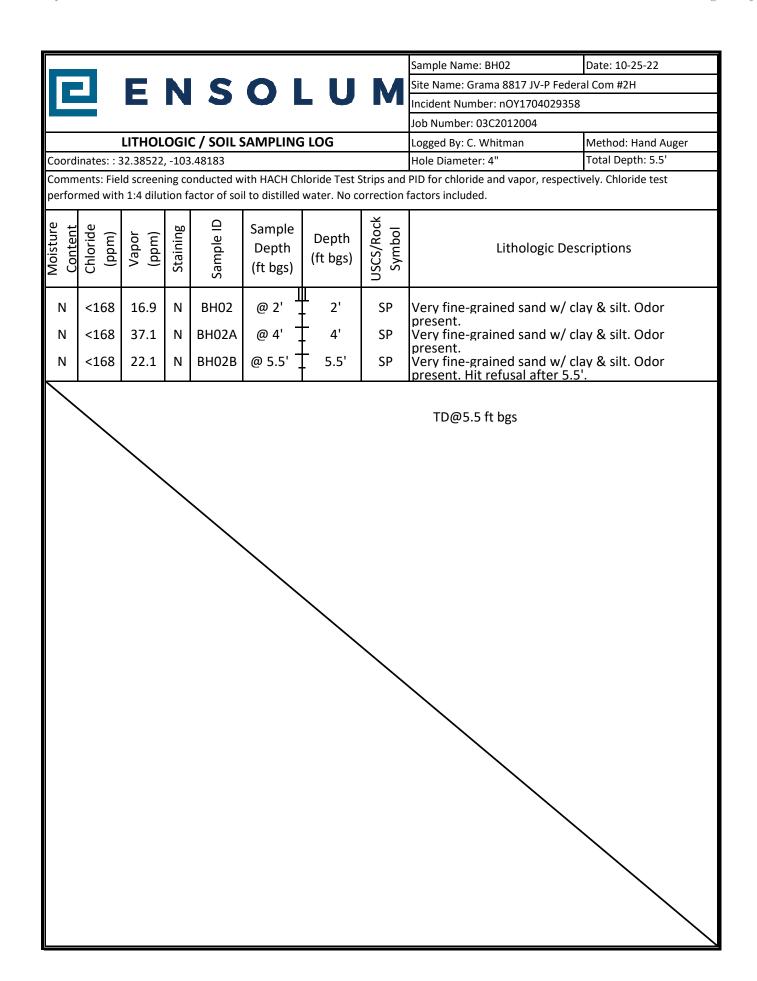
Photograph 4 Date: 10-25-22 Description: Photo of BH03 at a depth of 4'.

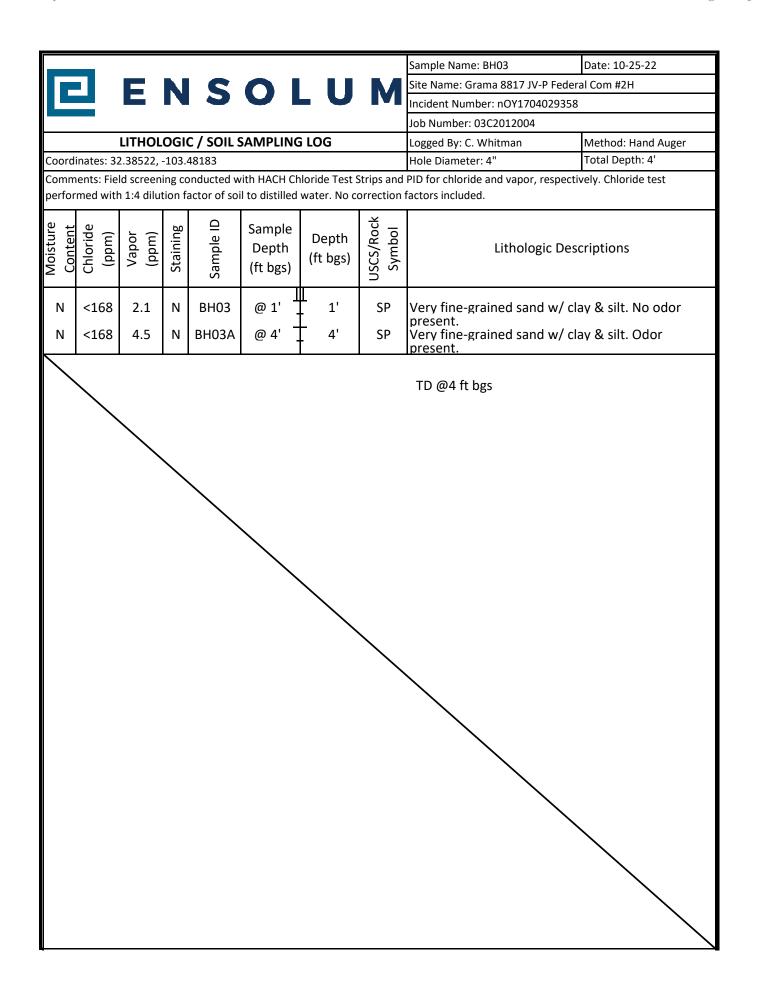


APPENDIX C

Lithologic Soil Sampling Logs









APPENDIX D

Laboratory Analytical Reports & Chain of Custody Documentation



October 12, 2022

HADLIE GREEN
ENSOLUM
3122 NATIONAL PARKS HWY
CARLSBAD, NM 88220

RE: GRAMA 8817 JV-P-FEDERAL COM #2H

Enclosed are the results of analyses for samples received by the laboratory on 10/07/22 13:35.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-22-15. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/ga/lab accred certif.html.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2 Haloacetic Acids (HAA-5)
Method EPA 524.2 Total Trihalomethanes (TTHM)
Method EPA 524.4 Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

Celey D. Keine

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keene

Lab Director/Quality Manager



Analytical Results For:

ENSOLUM HADLIE GREEN 3122 NATIONAL PARKS HWY CARLSBAD NM, 88220 Fax To:

Received: 10/07/2022 Sampling Date: 10/06/2022

Reported: 10/12/2022 Sampling Type: Soil

Project Name: GRAMA 8817 JV-P-FEDERAL COM #2H Sampling Condition: Cool & Intact Project Number: 03C2012004 Sample Received By: Tamara Oldaker

Project Location: BTA - NM

Sample ID: SS 01 (H224725-01)

BTEX 8021B	mg,	/kg	Analyze	d By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/11/2022	ND	2.01	100	2.00	1.09	
Toluene*	<0.050	0.050	10/11/2022	ND	2.01	100	2.00	0.403	
Ethylbenzene*	<0.050	0.050	10/11/2022	ND	1.96	97.9	2.00	0.492	
Total Xylenes*	<0.150	0.150	10/11/2022	ND	5.99	99.8	6.00	0.0446	
Total BTEX	<0.300	0.300	10/11/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	101	% 69.9-14	0						
Chloride, SM4500CI-B	mg,	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	10/11/2022	ND	384	96.0	400	4.08	
TPH 8015M	mg,	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/11/2022	ND	195	97.4	200	4.38	
DRO >C10-C28*	<10.0	10.0	10/11/2022	ND	192	96.1	200	12.6	
EXT DRO >C28-C36	<10.0	10.0	10/11/2022	ND					
Surrogate: 1-Chlorooctane	104	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	126	% 46.3-17	8						

Cardinal Laboratories *=Accredited Analyte

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Celey D. Keene



Analytical Results For:

ENSOLUM HADLIE GREEN 3122 NATIONAL PARKS HWY CARLSBAD NM, 88220 Fax To:

Received: 10/07/2022 Sampling Date: 10/06/2022

Reported: 10/12/2022 Sampling Type: Soil

Project Name: GRAMA 8817 JV-P-FEDERAL COM #2H Sampling Condition: Cool & Intact
Project Number: 03C2012004 Sample Received By: Tamara Oldaker

Applyzod By: 1H /

Project Location: BTA - NM

ma/ka

Sample ID: SS 02 (H224725-02)

RTFY 8021R

BIEX 8021B	mg	/ kg	Anaiyze	a By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/11/2022	ND	2.01	100	2.00	1.09	
Toluene*	<0.050	0.050	10/11/2022	ND	2.01	100	2.00	0.403	
Ethylbenzene*	<0.050	0.050	10/11/2022	ND	1.96	97.9	2.00	0.492	
Total Xylenes*	<0.150	0.150	10/11/2022	ND	5.99	99.8	6.00	0.0446	
Total BTEX	<0.300	0.300	10/11/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	105	% 69.9-14	0						
Chloride, SM4500CI-B	mg,	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	10/11/2022	ND	384	96.0	400	4.08	
TPH 8015M	mg,	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/10/2022	ND	202	101	200	1.79	
DRO >C10-C28*	<10.0	10.0	10/10/2022	ND	207	103	200	1.05	
EXT DRO >C28-C36	<10.0	10.0	10/10/2022	ND					
Surrogate: 1-Chlorooctane	89.6	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	97.0	% 46.3-17	8						

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Analytical Results For:

ENSOLUM HADLIE GREEN 3122 NATIONAL PARKS HWY CARLSBAD NM, 88220 Fax To:

Received: 10/07/2022 Sampling Date: 10/06/2022

Reported: 10/12/2022 Sampling Type: Soil

Project Name: GRAMA 8817 JV-P-FEDERAL COM #2H Sampling Condition: Cool & Intact
Project Number: 03C2012004 Sample Received By: Tamara Oldaker

Project Location: BTA - NM

Sample ID: SS 03 (H224725-03)

BTEX 8021B	mg,	'kg	Analyze	d By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/11/2022	ND	2.01	100	2.00	1.09	
Toluene*	<0.050	0.050	10/11/2022	ND	2.01	100	2.00	0.403	
Ethylbenzene*	<0.050	0.050	10/11/2022	ND	1.96	97.9	2.00	0.492	
Total Xylenes*	<0.150	0.150	10/11/2022	ND	5.99	99.8	6.00	0.0446	
Total BTEX	<0.300	0.300	10/11/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	103	% 69.9-14	0						
Chloride, SM4500CI-B	mg,	'kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	10/11/2022	ND	384	96.0	400	4.08	
TPH 8015M	mg,	'kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/10/2022	ND	202	101	200	1.79	
DRO >C10-C28*	<10.0	10.0	10/10/2022	ND	207	103	200	1.05	
EXT DRO >C28-C36	<10.0	10.0	10/10/2022	ND					
Surrogate: 1-Chlorooctane	94.0	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	102	% 46.3-17	8						

Cardinal Laboratories *=Accredited Analyte

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Celey D. Keine



Notes and Definitions

ND Analyte NOT DETECTED at or above the reporting limit

RPD Relative Percent Difference

** Samples not received at proper temperature of 6°C or below.

*** Insufficient time to reach temperature.

- Chloride by SM4500Cl-B does not require samples be received at or below 6°C

Samples reported on an as received basis (wet) unless otherwise noted on report

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Celeg D. Freene

Sampler - UPS - Bus - Other: Delivered By: (Circle One)

Corrected Temp. °C Observed Temp. °C

Cool Intact

Yes Yes

No No

CHECKED BY: (Initials)

Turnaround Time: 5- DAY Thermometer ID #113 Correction Factor -0.5°C

Bacteria (only) Sample Condition
Cool Intact Observed Temp.

Yes Yes
No Corrected Temp.

Corrected Temp. °C Observed Temp. °C

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST



101 East Marland, Hobbs, NM 88240 (575) 393-2326 FAX (575) 393-2476

Company Name:	ENSULIA		BILL TO				A	NALY	SIS RI	ANALYSIS REQUEST	
Project Manager:	1		P.O. #:		-	\dashv		_	-		
Address:			Company: 3TA OIL	-				7.7			, 1
City:	State:	Zip:	Attn: 300 HALL					ű.			
Phone #: 432 - 557 - 8895	551.8895 Fax#:		Address: IN & Pitus	St.		_					
Project #: 036 2012004	Project Owner:	er:	City: MIDLAND								
Project Name: GRAMA 8517	CRAMA 8817 JV-P-FEDERAL	COM#8#	State: TX Zip: 7	79701					-		
Project Location:	II AM		Phone #: 43 2-312-2203	2006					A COLUMN TO SERVICE AND ADDRESS OF THE PARTY		
Sampler Name:	CONVER SHORE		Fax #:		1						
FOR LAB USE ONLY		MATRIX	PRESERV. SAMPLING	PING							
Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP. # CONTAINERS GROUNDWATER WASTEWATER SOIL OIL SLUDGE	OTHER: ACID/BASE: ICE / COOL OTHER:	TIME	BTEX	TPH Chlonde					
	5501	1 ×	*	1930	×	X		_	1		
2	530 %	6 1 X	× 10.6.53	12 35 41	X	X					
CU	\$503	X	\$ 10.6.37	10461	X	X					
		100000									
										,	
	1/2							-	-		
	\$ 16										
	8/1				_			7 10			
	9							San San			
LEASE NOTE: Liability and	Damages. Cardinat's liability and client's exclusive remedy to	r any claim arising whether based in contract	or fort shall be limited to the amount poid	by the client for the	-	-			H		
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Relinquished By:	Date: 7-2-	Received By:	MILL	Verbal Result:	t:		s ☐ No Add'l Phone #: Please provide Email address:	Add'l Phone #: de Email addre	ne #: ddress:		
Relinguished Ru		Jamara	Markon	horrech @	SWS		mo				
veilliduistied by.	Time:	Necewed by:		KEMAKKS:							



October 12, 2022

HADLIE GREEN
ENSOLUM
3122 NATIONAL PARKS HWY
CARLSBAD, NM 88220

RE: GRAMA JVP FED. COM #2H

Enclosed are the results of analyses for samples received by the laboratory on 10/07/22 13:35.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-22-15. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/ga/lab accred certif.html.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2 Haloacetic Acids (HAA-5)
Method EPA 524.2 Total Trihalomethanes (TTHM)
Method EPA 524.4 Regulated VOCs (V1, V2, V3)

Celey D. Keine

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keene

Lab Director/Quality Manager



10/06/2022

Analytical Results For:

ENSOLUM HADLIE GREEN 3122 NATIONAL PARKS HWY CARLSBAD NM, 88220 Fax To:

Received: 10/07/2022 Sampling Date:

Reported: 10/12/2022 Sampling Type: Soil

Project Name: GRAMA JVP FED. COM #2H Sampling Condition: Cool & Intact Project Number: 03C2012004 Sample Received By: Tamara Oldaker

Project Location: BTA - NM

Sample ID: SS 04 (H224726-01)

BTEX 8021B	mg,	/kg	Analyze	d By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/11/2022	ND	2.01	100	2.00	1.09	
Toluene*	<0.050	0.050	10/11/2022	ND	2.01	100	2.00	0.403	
Ethylbenzene*	<0.050	0.050	10/11/2022	ND	1.96	97.9	2.00	0.492	
Total Xylenes*	<0.150	0.150	10/11/2022	ND	5.99	99.8	6.00	0.0446	
Total BTEX	<0.300	0.300	10/11/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	105	% 69.9-14	0						
Chloride, SM4500CI-B	mg,	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	10/11/2022	ND	400	100	400	3.92	
TPH 8015M	mg,	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/10/2022	ND	202	101	200	1.79	
DRO >C10-C28*	<10.0	10.0	10/10/2022	ND	207	103	200	1.05	
EXT DRO >C28-C36	<10.0	10.0	10/10/2022	ND					
Surrogate: 1-Chlorooctane	81.5	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	87.2	% 46.3-17	8						

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Celey D. Keene



10/06/2022

Analytical Results For:

ENSOLUM HADLIE GREEN 3122 NATIONAL PARKS HWY CARLSBAD NM, 88220 Fax To:

Received: 10/07/2022 Sampling Date:

Reported: 10/12/2022 Sampling Type: Soil

Project Name: GRAMA JVP FED. COM #2H Sampling Condition: Cool & Intact
Project Number: 03C2012004 Sample Received By: Tamara Oldaker

Project Location: BTA - NM

Sample ID: SS 05 (H224726-02)

BTEX 8021B	mg,	'kg	Analyze	d By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/11/2022	ND	2.01	100	2.00	1.09	
Toluene*	<0.050	0.050	10/11/2022	ND	2.01	100	2.00	0.403	
Ethylbenzene*	<0.050	0.050	10/11/2022	ND	1.96	97.9	2.00	0.492	
Total Xylenes*	<0.150	0.150	10/11/2022	ND	5.99	99.8	6.00	0.0446	
Total BTEX	<0.300	0.300	10/11/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	106	% 69.9-14	0						
Chloride, SM4500CI-B	mg,	'kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	10/11/2022	ND	400	100	400	3.92	
TPH 8015M	mg,	'kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/11/2022	ND	202	101	200	1.79	
DRO >C10-C28*	<10.0	10.0	10/11/2022	ND	207	103	200	1.05	
EXT DRO >C28-C36	<10.0	10.0	10/11/2022	ND					
Surrogate: 1-Chlorooctane	97.9	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	105	% 46.3-17	8						

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Celey D. Keine



Analytical Results For:

ENSOLUM HADLIE GREEN 3122 NATIONAL PARKS HWY CARLSBAD NM, 88220 Fax To:

Received: 10/07/2022 Reported: 10/12/2022

GRAMA JVP FED. COM #2H

Project Name: Project Number: 03C2012004

Project Location: BTA - NM Sampling Date: 10/06/2022

Sampling Type: Soil

Sampling Condition: Cool & Intact Sample Received By: Tamara Oldaker

Sample ID: SS 06 (H224726-03)

BTEX 8021B	mg/	kg	Analyze	d By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/11/2022	ND	2.01	100	2.00	1.09	
Toluene*	<0.050	0.050	10/11/2022	ND	2.01	100	2.00	0.403	
Ethylbenzene*	<0.050	0.050	10/11/2022	ND	1.96	97.9	2.00	0.492	
Total Xylenes*	<0.150	0.150	10/11/2022	ND	5.99	99.8	6.00	0.0446	
Total BTEX	<0.300	0.300	10/11/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	104 9	69.9-14	0						
Chloride, SM4500CI-B	mg/	kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	10/11/2022	ND	400	100	400	3.92	
TPH 8015M	mg/	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/11/2022	ND	202	101	200	1.79	
DRO >C10-C28*	<10.0	10.0	10/11/2022	ND	207	103	200	1.05	
EXT DRO >C28-C36	<10.0	10.0	10/11/2022	ND					
Surrogate: 1-Chlorooctane	97.9	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	102 9	6 46.3-17	8						

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Celey D. Keine



Analytical Results For:

ENSOLUM HADLIE GREEN 3122 NATIONAL PARKS HWY CARLSBAD NM, 88220 Fax To:

Received: 10/07/2022 Reported: 10/12/2022

10/12/2022

Project Name: GRAMA JVP FED. COM #2H

Project Number: 03C2012004 Project Location: BTA - NM Sampling Date: 10/06/2022

Sampling Type: Soil

Sampling Condition: Cool & Intact
Sample Received By: Tamara Oldaker

Sample ID: SS 07 (H224726-04)

BTEX 8021B	mg	/kg	Analyze	ed By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/11/2022	ND	2.01	100	2.00	1.09	
Toluene*	<0.050	0.050	10/11/2022	ND	2.01	100	2.00	0.403	
Ethylbenzene*	<0.050	0.050	10/11/2022	ND	1.96	97.9	2.00	0.492	
Total Xylenes*	<0.150	0.150	10/11/2022	ND	5.99	99.8	6.00	0.0446	
Total BTEX	<0.300	0.300	10/11/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	107	% 69.9-14	0						
Chloride, SM4500CI-B	mg,	/kg	Analyze	ed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	10/11/2022	ND	400	100	400	3.92	
TPH 8015M	mg,	/kg	Analyze	ed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/11/2022	ND	202	101	200	1.79	
DRO >C10-C28*	<10.0	10.0	10/11/2022	ND	207	103	200	1.05	
EXT DRO >C28-C36	<10.0	10.0	10/11/2022	ND					
Surrogate: 1-Chlorooctane	97.9	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	102	% 46.3-17	78						

Cardinal Laboratories *=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whistoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keine



Notes and Definitions

ND Analyte NOT DETECTED at or above the reporting limit

RPD Relative Percent Difference

** Samples not received at proper temperature of 6°C or below.

*** Insufficient time to reach temperature.

- Chloride by SM4500Cl-B does not require samples be received at or below 6°C

Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories *=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whistoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results related only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celeg D. Freene

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240 (575) 393-2326 FAX (575) 393-2476

company Name: ENSOLUM		BILL TO				
Project Manager: HADUE GREEN		P.O. #:			AWALTOIS KEQUEST	
Address:		Company: 3TA Oil				
City:	State: Zip:	Attn: BOB HALL				-
Phone #: 432.557.8855	Fax#:	Address: 104 SPECC55+.	5554.			
Project #: 03C 2012004	Project Owner:	City: MIDLAND		•		
Project Name: GRAMA TVA FED.	He# WOD	State: TX Zip: 76701	<u> </u>			
Project Location: PM		ئن	202			
Sampler Name: CONNER SHOPE		Fax #:				
FOR LAB USE ONLY	MATRIX	SERV.	SAMPLING	5		
Lab I.D. Sample I.D.	OR (C)OMI INERS WATER		×	ides		
	B CONTA	BAS	T	-		
H224726	# CON GROU WASTI SOIL OIL SLUDG	OTHER ACID/B CE / C OTHER DATE	BT	TPI		
4055	×	10	N SYG	X		+
20852	6 2 ×	10.4.03	x 0561	X		
) SSOW	61 K	10.6.33	12561	X		
4 5507	6 1 ×	10.6.33		×		
			\			
	26.93					
	(6:3)					
The state of the s						
EASE NOTE: Liability and Damages. Cardinal's liability and client alyses. All claims including those for negligence and any other care	PLEASE NOTE: Liability and Damages. Cardinal's liability and citent's exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 does after completion of the contraction.	ort, shall be limited to the amount paid the served by Cardinal within 30 days offers	by the client for the	-		
affiliates or successors arising out of or related to the performance of	affiliales or successors arising out of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.	of use, or loss of profits incurred by clie ised upon any of the above stated reas	ent, its subsidiaries, ons or otherwise.			
) de la company	10-7-22 Received By:	0.0	Verbal Result:	☐ Yes ☐ No	Add'l Phone #:	
	335		All Results are emailed. Please provide Email address: hgreen @ensolum.com	olum .com	ride Email address:	
remiquisited by.	Time: Received By:		REMARKS:			
Delivered By: (Circle One) Obse	Observed Temp. °C 6 Sample Condition	BY:	Turnaround Time:	Standard	Bacteria (only) Sample Condition	3
Sampler - UPS - Bus - Other: Corre	Corrected Temp. °C S,S Wes Yes No No	(Initials)	Thermometer ID #113 Correction Factor -0.5°C		☐ Cool Intact Observed Temp. °C	p. °C
•	† Cardinal cannot accept verbal changes. Please email changes to celey.keene@cardinallabsnm.com	es. Please email chang	jes to celey.keen	e@cardinallabs	snm.com	p. C



October 31, 2022

HADLIE GREEN
ENSOLUM
3122 NATIONAL PARKS HWY
CARLSBAD, NM 88220

RE: GRAMA 8817 JV-P-FEDERAL COM #2H

Enclosed are the results of analyses for samples received by the laboratory on 10/26/22 14:30.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-22-15. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/ga/lab accred certif.html.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2 Haloacetic Acids (HAA-5)
Method EPA 524.2 Total Trihalomethanes (TTHM)
Method EPA 524.4 Regulated VOCs (V1, V2, V3)

Celey D. Keine

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keene

Lab Director/Quality Manager



Analytical Results For:

ENSOLUM HADLIE GREEN 3122 NATIONAL PARKS HWY CARLSBAD NM, 88220 Fax To:

Received: 10/26/2022 Sampling Date: 10/25/2022

Reported: 10/31/2022 Sampling Type: Soil

Project Name: GRAMA 8817 JV-P-FEDERAL COM #2H Sampling Condition: Cool & Intact
Project Number: 03C2012004 Sample Received By: Shalyn Rodriguez

Project Location: BTA - NM

Sample ID: BH 01 1' (H225033-01)

BTEX 8021B	mg,	/kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/31/2022	ND	2.01	100	2.00	7.25	
Toluene*	<0.050	0.050	10/31/2022	ND	2.15	108	2.00	5.90	
Ethylbenzene*	<0.050	0.050	10/31/2022	ND	2.12	106	2.00	5.13	
Total Xylenes*	<0.150	0.150	10/31/2022	ND	6.36	106	6.00	5.33	
Total BTEX	<0.300	0.300	10/31/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	90.6	% 69.9-14	0						
Chloride, SM4500CI-B	mg,	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	10/28/2022	ND	432	108	400	0.00	
TPH 8015M	mg,	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/28/2022	ND	220	110	200	0.785	
DRO >C10-C28*	11.2	10.0	10/28/2022	ND	222	111	200	2.84	
EXT DRO >C28-C36	<10.0	10.0	10/28/2022	ND					
Surrogate: 1-Chlorooctane	80.6	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	98.3	% 46.3-17	8						

Cardinal Laboratories *=Accredited Analyte

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Celey D. Keene



Analytical Results For:

ENSOLUM HADLIE GREEN 3122 NATIONAL PARKS HWY CARLSBAD NM, 88220 Fax To:

Received: 10/26/2022 Sampling Date: 10/25/2022

Reported: 10/31/2022 Sampling Type: Soil

Project Name: GRAMA 8817 JV-P-FEDERAL COM #2H Sampling Condition: Cool & Intact
Project Number: 03C2012004 Sample Received By: Shalyn Rodriguez

Applyzod By: 14

Project Location: BTA - NM

ma/ka

Sample ID: BH 01A 2' (H225033-02)

RTFY 8021R

B1EX 8021B	mg,	rkg	Allalyze	a By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/31/2022	ND	2.01	100	2.00	7.25	
Toluene*	<0.050	0.050	10/31/2022	ND	2.15	108	2.00	5.90	
Ethylbenzene*	<0.050	0.050	10/31/2022	ND	2.12	106	2.00	5.13	
Total Xylenes*	<0.150	0.150	10/31/2022	ND	6.36	106	6.00	5.33	
Total BTEX	<0.300	0.300	10/31/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	93.2	% 69.9-14	0						
Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	10/28/2022	ND	432	108	400	0.00	
TPH 8015M	mg,	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/28/2022	ND	220	110	200	0.785	
DRO >C10-C28*	<10.0	10.0	10/28/2022	ND	222	111	200	2.84	
EXT DRO >C28-C36	<10.0	10.0	10/28/2022	ND					
Surrogate: 1-Chlorooctane	86.9	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	103	% 46.3-17	8						

Cardinal Laboratories *=Accredited Analyte

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Celey D. Keene



Analytical Results For:

ENSOLUM HADLIE GREEN 3122 NATIONAL PARKS HWY CARLSBAD NM, 88220 Fax To:

Received: 10/26/2022 Sampling Date: 10/25/2022

Reported: 10/31/2022 Sampling Type: Soil

Project Name: GRAMA 8817 JV-P-FEDERAL COM #2H Sampling Condition: Cool & Intact
Project Number: 03C2012004 Sample Received By: Shalyn Rodriguez

Applyzod By: 14

Project Location: BTA - NM

ma/ka

Sample ID: BH 01B 4' (H225033-03)

RTFY 8021R

BIEX 8021B	mg	/кд	Anaiyze	a By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/31/2022	ND	2.01	100	2.00	7.25	
Toluene*	<0.050	0.050	10/31/2022	ND	2.15	108	2.00	5.90	
Ethylbenzene*	<0.050	0.050	10/31/2022	ND	2.12	106	2.00	5.13	
Total Xylenes*	<0.150	0.150	10/31/2022	ND	6.36	106	6.00	5.33	
Total BTEX	<0.300	0.300	10/31/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	89.0	% 69.9-14	0						
Chloride, SM4500CI-B	mg	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	10/28/2022	ND	432	108	400	0.00	
TPH 8015M	mg,	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/28/2022	ND	220	110	200	0.785	
DRO >C10-C28*	<10.0	10.0	10/28/2022	ND	222	111	200	2.84	
EXT DRO >C28-C36	<10.0	10.0	10/28/2022	ND					
Surrogate: 1-Chlorooctane	85.5	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	102	% 46.3-17	8						

Cardinal Laboratories *=Accredited Analyte

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Celey D. Keine



Notes and Definitions

ND Analyte NOT DETECTED at or above the reporting limit

RPD Relative Percent Difference

** Samples not received at proper temperature of 6°C or below.

*** Insufficient time to reach temperature.

- Chloride by SM4500Cl-B does not require samples be received at or below 6°C

Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories *=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whistoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results related only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keine

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST



(575) 393-2326 FAX (575) 393-2476	X (575) 393-2476		
Company Name: Ensolum IIIC		BILL TO	ANALYSIS REQUEST
I		P.O. #:	
Address: 601 N. Marienfeld St. STE 400	.00	Company: BTA Oil	
City: Midland	State: TX Zip: 79701		
Phone #: 432 \SS7 -8495	Fax#:	Pecos	57.
-	Project Owner:	City: Midland	
Project Name: Grana 88)7		State: 1 X Zip: /9/01	
on:		Phone #: 432-512-2203	
Sampler Name: Connor Whitm	44		
(1)		PRESERV. SAMPLING	NG
Lab I.D. Sample I.D.	(feet) (feet) (feet) (G)RAB OR (C)OMP. CONTAINERS ROUNDWATER VASTEWATER OIL	DITHER: CID/BASE: CE / COOL DITHER:	BTEX TPH Chloria
LOHY CONCRET	- 1	1 10/25/22	lios
	22		
2 PHOIR			1:20
PLEASE NOTE: Lability and Damages, Cardinal's liability and o amahases. All claims including those for negligence and any other	PLEASE NOTE: Lability and Damages. Cardinal's lability and client's exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the gnapleses. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in witing and received by Cardinal within 30 days after completion of the applicable analyses. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in witing and received by Cardinal within 30 days after completion of the applicable	nitract or tort, shall be limited to the amount paid ing and received by Cardinal within 30 days after of the amount paid in grant bace of tree or loss of profits incurred by click	unt paid by the client for the bys after completion of the applicable red by client, its subsidiaries,
Relinquished By:	Ce of services hereunder by Cardinal regardless of whether such Date: Received By: Time:	if such claim is based upon any of the above surroused.	Verbal Result: ☐ Yes ☐ No
Relinquished By:	Receiv		13
Delivered By: (Circle One) Sampler - UPS - Bus - Other:	Observed Temp. °C 2.0 Sample Condition Cool Mact Pres Pres	Condition CHECKED BY: Injurials) I No	Turnaround Time: Standard Deacteria (only) Sample Contacton Rush Cool Intact Observed Temp. °C Thermometer ID #113 Correction Factor -0.8°C \$6 /0/36/37 No Corrected Temp. °C
FURM-000 R 3.2 10/07/21	† Cardinal cannot accept verbal changes. Please email changes to celey keene	changes. Please email char	ges to celey.keene@cardinallabsnm.com



October 31, 2022

HADLIE GREEN
ENSOLUM
3122 NATIONAL PARKS HWY
CARLSBAD, NM 88220

RE: GRAMA 8817 JV-P-FEDERAL COM #2H

Enclosed are the results of analyses for samples received by the laboratory on 10/26/22 14:30.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-22-15. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/ga/lab accred certif.html.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2 Haloacetic Acids (HAA-5)
Method EPA 524.2 Total Trihalomethanes (TTHM)
Method EPA 524.4 Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

Celey D. Keine

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keene

Lab Director/Quality Manager



Analytical Results For:

ENSOLUM HADLIE GREEN 3122 NATIONAL PARKS HWY CARLSBAD NM, 88220 Fax To:

Received: 10/26/2022 Sampling Date: 10/25/2022

Reported: 10/31/2022 Sampling Type: Soil

Project Name: GRAMA 8817 JV-P-FEDERAL COM #2H Sampling Condition: Cool & Intact Project Number: 03C2012004 Sample Received By: Shalyn Rodriguez

Project Location: BTA - NM

Sample ID: BH 02 2' (H225034-01)

BTEX 8021B	mg/	kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/31/2022	ND	2.01	100	2.00	7.25	
Toluene*	<0.050	0.050	10/31/2022	ND	2.15	108	2.00	5.90	
Ethylbenzene*	<0.050	0.050	10/31/2022	ND	2.12	106	2.00	5.13	
Total Xylenes*	<0.150	0.150	10/31/2022	ND	6.36	106	6.00	5.33	
Total BTEX	<0.300	0.300	10/31/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	90.9	% 69.9-14	0						
Chloride, SM4500CI-B	mg/	'kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	10/28/2022	ND	432	108	400	0.00	
TPH 8015M	mg/	'kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/28/2022	ND	220	110	200	0.785	
DRO >C10-C28*	<10.0	10.0	10/28/2022	ND	222	111	200	2.84	
EXT DRO >C28-C36	<10.0	10.0	10/28/2022	ND					
Surrogate: 1-Chlorooctane	82.3	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	99.0	% 46.3-17	78						

Cardinal Laboratories *=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keine



Analytical Results For:

ENSOLUM HADLIE GREEN 3122 NATIONAL PARKS HWY CARLSBAD NM, 88220 Fax To:

Received: 10/26/2022 Sampling Date: 10/25/2022

Reported: 10/31/2022 Sampling Type: Soil

Project Name: GRAMA 8817 JV-P-FEDERAL COM #2H Sampling Condition: Cool & Intact
Project Number: 03C2012004 Sample Received By: Shalyn Rodriguez

Applyzod By: 14

Project Location: BTA - NM

ma/ka

Sample ID: BH 02A 4' (H225034-02)

RTFY 8021R

Result <0.050 <0.050	Reporting Limit 0.050 0.050	Analyzed 10/31/2022	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<0.050		10/31/2022	ND					
	0.050			2.01	100	2.00	7.25	
<0.050		10/31/2022	ND	2.15	108	2.00	5.90	
~0.050	0.050	10/31/2022	ND	2.12	106	2.00	5.13	
<0.150	0.150	10/31/2022	ND	6.36	106	6.00	5.33	
<0.300	0.300	10/31/2022	ND					
91.9	% 69.9-14	0						
mg/	'kg	Analyze	d By: AC					
Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<16.0	16.0	10/28/2022	ND	432	108	400	0.00	
mg/	'kg	Analyze	d By: MS					
Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<10.0	10.0	10/28/2022	ND	220	110	200	0.785	
23.9	10.0	10/28/2022	ND	222	111	200	2.84	
<10.0	10.0	10/28/2022	ND					
82.0	% 45.3-16	1						
102 9	% 46.3-17	8						
	<0.300 91.9 mg/ Result <16.0 mg/ Result <10.0 23.9 <10.0	<0.150 0.150 <0.300 0.300 91.9 % 69.9-14 mg/ky Result Reporting Limit <16.0 16.0 mg/ky Result Reporting Limit <10.0 10.0 23.9 10.0 <10.0 10.0	<0.150	<0.150	<0.150	<0.150	<0.150 0.150 10/31/2022 ND 6.36 106 6.00 91.9 ⅓ 69.9-140 ND 69.9-140 ND 69.9-140 ND Analyzed ND ND	<0.150

Cardinal Laboratories *=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whistoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keene



Analytical Results For:

ENSOLUM HADLIE GREEN 3122 NATIONAL PARKS HWY CARLSBAD NM, 88220 Fax To:

Received: 10/26/2022 Sampling Date: 10/25/2022

Reported: 10/31/2022 Sampling Type: Soil

Project Name: GRAMA 8817 JV-P-FEDERAL COM #2H Sampling Condition: Cool & Intact
Project Number: 03C2012004 Sample Received By: Shalyn Rodriguez

Analyzed By: JH

Project Location: BTA - NM

Sample ID: BH 02B 5.5' (H225034-03)

BTEX 8021B

	<u> </u>			. ,					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/31/2022	ND	2.01	100	2.00	7.25	
Toluene*	<0.050	0.050	10/31/2022	ND	2.15	108	2.00	5.90	
Ethylbenzene*	<0.050	0.050	10/31/2022	ND	2.12	106	2.00	5.13	
Total Xylenes*	<0.150	0.150	10/31/2022	ND	6.36	106	6.00	5.33	
Total BTEX	<0.300	0.300	10/31/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	91.9	% 69.9-14	0						
Chloride, SM4500CI-B	mg,	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	10/28/2022	ND	432	108	400	0.00	
TPH 8015M	mg	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/28/2022	ND	220	110	200	0.785	
DRO >C10-C28*	<10.0	10.0	10/28/2022	ND	222	111	200	2.84	
EXT DRO >C28-C36	<10.0	10.0	10/28/2022	ND					
Surrogate: 1-Chlorooctane	79.8	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	95.1	% 46.3-17	8						

Cardinal Laboratories *=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whistoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results related only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celeg & Keene



Notes and Definitions

ND Analyte NOT DETECTED at or above the reporting limit

RPD Relative Percent Difference

** Samples not received at proper temperature of 6°C or below.

*** Insufficient time to reach temperature.

Chloride by SM4500Cl-B does not require samples be received at or below 6°C

Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories *=Accredited Analyte

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Celeg D. Keene

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST



Delivered By: (Circle One) Sampler - UPS - Bus - Other:		Relinquished By:	and	Relinquished By:	analyses. All claims included service. In no event shall Ca	PLEASE NOTE: Liability and			O.	2)	45 SPER	Lab I.D.	FOR LAB USE ONLY	Sampler Name:	Project Location:	Project Name:	Project #: 0 3C 2012004	Phone #: 432-557-8895	City: Midland	Address: 601 N		Company Name:	
		ā	What	g out of or related to the performa	g mose for negligence and any or rdinal be liable for incidental or co	Damages, Cardinal's liability and			BHOZB	BH 02A	BH02		Sample I.D.	- 1	Conner White		Jame 8817	2012004	557-8895		. Marienfelo	I	Ensolum 11C	(575) 393-2326 F
Observed Temp. °C	Time:	Date:	Time: 30	Date:	nsequental damages, including	client's exclusive remedy for an			5.5	7	2		Sample Depth (feet)		town		7	Project Owner:	Fax #:	State: TX Z	400			FAX (575) 393-2476
Sample Condition Cool Intact A Yes A No D No		Received By:	8	Received By:	without limitation, business interrupt	claim arising whether based in cor- emed waived unless made in writing			6		2	# G S S	S)RAB OR (C)OMF CONTAINERS ROUNDWATER WASTEWATER OIL	MATRIX						Zip: 79701				3,
Yes (Initials)		0	Pan July		analyses. All claims including those for negigerice and any sured was a monocore in the first terms of the service. In no event shall Cardinal be liable for incidental or consequental damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, service. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, service. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, and its consequential damages.	PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount past by the client to the applicable			/ 10/25/72	/ (0/25/22	/ 10/25/22	A	CELODGE COD/BASE: CE / COOL COTHER:	PRESERV.		Phone #: 432-312-2203	State: 1 X Zip: /9/0	City: /1:d/and	N	Attn: Bob Hall	Company: BTA O'	P.O. #:	BILL TO	
Thermometer ID		REMARKS:	BJennings@ensol	Verbal Result: All Results are em	by dient, its subsidiaries, ed reasons or otherwise.	after completion of the applicable			2 12.43		11.50	+	BTEX	SAMPLING	NO.	-2203	101	-	Pros St.					
Rush C Styloward	9		olum.com	Verbal Result: Yes No Add I rhone #: All Results are emailed. Please provide Email address:						,		\	TPH Chloride										ANA	VIVV
Cool Intact C	Bacteria (only) Sample Condition			de Email address:																			ANALTOIO NEGOLO	
Observed Temp. °C Corrected Temp. °C	mple Condition																							17



November 03, 2022

HADLIE GREEN
ENSOLUM
3122 NATIONAL PARKS HWY
CARLSBAD, NM 88220

RE: GRAMA 8817 JV-P-FEDERAL COM #2H

Enclosed are the results of analyses for samples received by the laboratory on 10/26/22 14:30.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-22-15. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/ga/lab accred certif.html.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2 Haloacetic Acids (HAA-5)
Method EPA 524.2 Total Trihalomethanes (TTHM)
Method EPA 524.4 Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

Wite Sough

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Mike Snyder For Celey D. Keene

Lab Director/Quality Manager



Analytical Results For:

ENSOLUM HADLIE GREEN 3122 NATIONAL PARKS HWY CARLSBAD NM, 88220 Fax To:

Received: 10/26/2022 Sampling Date: 10/25/2022

Reported: 11/03/2022 Sampling Type: Soil

Project Name: GRAMA 8817 JV-P-FEDERAL COM #2H Sampling Condition: Cool & Intact Project Number: 03C2012004 Sample Received By: Shalyn Rodriguez

Project Location: BTA - NM

Sample ID: BH 03 1' (H225035-01)

BTEX 8260B	mg,	'kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.025	0.025	11/03/2022	ND	0.471	94.1	0.500	2.37	
Toluene*	<0.025	0.025	11/03/2022	ND	0.475	94.9	0.500	2.01	
Ethylbenzene*	<0.025	0.025	11/03/2022	ND	0.494	98.9	0.500	0.978	
Total Xylenes*	<0.075	0.075	11/03/2022	ND	1.51	101	1.50	1.51	
Total BTEX	<0.150	0.150	11/03/2022	ND					
Surrogate: Dibromofluoromethane	94.6	% 86.7-11	1						
Surrogate: Toluene-d8	97.4	% 89.3-11	0						
Surrogate: 4-Bromofluorobenzene	103	% 88.2-10	8						
Chloride, SM4500Cl-B	mg,	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	10/28/2022	ND	432	108	400	0.00	
TPH 8015M	mg,	'kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/29/2022	ND	220	110	200	0.785	
DRO >C10-C28*	<10.0	10.0	10/29/2022	ND	222	111	200	2.84	
EXT DRO >C28-C36	<10.0	10.0	10/29/2022	ND					
Surrogate: 1-Chlorooctane	83.3	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	99.2	% 46.3-17	8						

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



Analytical Results For:

ENSOLUM HADLIE GREEN 3122 NATIONAL PARKS HWY CARLSBAD NM, 88220 Fax To:

Received: 10/26/2022 Sampling Date: 10/25/2022

Reported: 11/03/2022 Sampling Type: Soil

Project Name: GRAMA 8817 JV-P-FEDERAL COM #2H Sampling Condition: Cool & Intact
Project Number: 03C2012004 Sample Received By: Shalyn Rodriguez

Analyzed By: MS

Project Location: BTA - NM

mg/kg

Sample ID: BH 03A 4' (H225035-02)

BTEX 8260B

	<u> </u>			,					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.025	0.025	10/29/2022	ND	1.86	92.9	2.00	0.962	
Toluene*	<0.025	0.025	10/29/2022	ND	1.82	91.0	2.00	2.50	
Ethylbenzene*	<0.025	0.025	10/29/2022	ND	1.89	94.4	2.00	0.623	
Total Xylenes*	<0.075	0.075	10/29/2022	ND	5.80	96.7	6.00	0.847	
Total BTEX	<0.150	0.150	10/29/2022	ND					
Surrogate: Dibromofluoromethane	97.5	% 83.7-11	4						
Surrogate: Toluene-d8	95.4	% 95.3-10	07						
Surrogate: 4-Bromofluorobenzene	97.4	% 50.9-15	70						
Chloride, SM4500Cl-B	mg,	/kg	Analyze	ed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	10/28/2022	ND	432	108	400	0.00	
TPH 8015M	mg,	/kg	Analyze	ed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/29/2022	ND	220	110	200	0.785	
DRO >C10-C28*	<10.0	10.0	10/29/2022	ND	222	111	200	2.84	
EXT DRO >C28-C36	<10.0	10.0	10/29/2022	ND					
Surrogate: 1-Chlorooctane	81.4	% 45.3-16	51						
Surrogate: 1-Chlorooctadecane	97.5	% 46.3-17	78						

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Mile Sough

Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



Notes and Definitions

S-05 The surrogate recovery is outside of lab established statistical control limits but still within method limits. Data is not adversely

affected.

ND Analyte NOT DETECTED at or above the reporting limit

RPD Relative Percent Difference

** Samples not received at proper temperature of 6°C or below.

*** Insufficient time to reach temperature.

- Chloride by SM4500Cl-B does not require samples be received at or below 6°C

Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories *=Accredited Analyte

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Mule Sough

Mike Snyder For Celey D. Keene, Lab Director/Quality Manager

Released to Imaging: 2/20/2023 7:33:32 AM

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST



01 East Marland, Hobbs, NM 88240 (575) 393-2326 FAX (575) 393-2476

	201 (010) 000-2410		
Ensolum, LLC		BILL TO	ANALYSIS DECLIEST
Project Manager: Hadlit Green		P.O. #:	מוס את מו
Address: 601 N. Marienfeld St. STE 400	400	Company: BTA Oil	
City: Midland	State: TX Zip: 79701		
Phone #: 432-55/-8895	Fax #:	Address: 184 5 Perces 12	
Project #: 03C2012004	Project Owner: BTA	2000	
Project Name: Grama 8817	N	State: TX Zip: 79701	
Project Location:		# 432-	
Sampler Name: (anner White	Charl	Fax #:	
FOR LAB USE ONLY	MATRIX	PRESERV SAMPLING	
	R		
Lab I.D. Sample I.D.	(feet) (f	DTHER: CID/BASE: DE/COOL DTHER: BTEX	TPH Chlorida
	- #	10:35 10/95/2	\ -
2 BH03A	1 0 1	_	
PLEASE NOTE: Liability and Damages, Cardinal's liability and clien analyses. All claims including those for negligence and any other ca service. In no event shall Cardinal be liable for incidental or consequ	PLEASE NOTE: Liability and Damages. Cardinal's liability and clients exclusive remedy for any claim arising whether based in contract or fort, shall be limited to the amount paid by the client for the service. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, whichever shall cardinal be liable for incidental or consequential damages, including without limitation, whichever shall cardinal be liable for incidental or consequential damages, including without limitation, whichever shall cardinal be liable for incidental or consequential damages, including without limitation, whichever shall cardinal be liable for incidental or consequential damages, including without limitation, whichever shall be described by Cardinal within 30 days after completion of the applicable	tort, shall be limited to the amount paid by the client for the sceived by Cardinal within 30 days after completion of the applicable	
Relinquished By: Con White	Date: 10-30-30-30-30-30-30-30-30-30-30-30-30-30	Te er	☐ Yes ☐ No Add'I Phone #: nailed. Please provide Email address:
Relinquished By:	Received By:	72	· Oensolumicom
Delivered By: (Circle One)	Sample	CHECKED BY: Turnarou	
Sampler - UPS - Bus - Other: Corr	Corrected Temp. °C / 4 Pres Pres	(Initials) Thermometer ID #113 Correction Factor -0.800	Rush 0
			CALL COLOR OF THE CALL COLOR O



APPENDIX E

NMOCD Notifications

Quic • Gene Mater Event • Order Assc • Incide • Well I New • New • New • New ! • New • New • New • New '

SIGN-IN HELP

Searches

Operator Data

Hearing Fee Application

OCD Permitting

Home S

arches

Incident Details

NOY1704029358 GRAMA 88 17 N-P FEDERAL COM #2H @ 30-025-43426

General Incident	Information							
Site Name: Well: Facility: Operator: Status: Type: District: Incident Location: Lat/Long:	[260297] BTA OIL PF Closure Not Approve Oil Release Hobbs	MA 8817 JV-P FEDERA RODUCERS, LLC ad	AL COM #002H		Severity Surface County	Owner:	Minor State Lea (25)	
Directions:								
Notes								
Source of Referral:	Industry Rep				Action	Escalation:		
Resulted In Fire: Endangered Public Fresh Water Contai							l Watercourse: mental Damage:	
Contact Details Contact Name:					Contac	: Title:		
Event Dates Date of Discovery:		01/11/2017			OCD No	tified of Rel	ease:	01/11/2017
Extension Date: Initial C-141 Receiv Characterization Re Remediation Plan F	eport Received:	11/15/2018 02/09/2017			Charac Remedi	ed Date: erization Re ation Plan A ation Due:	port Approved: pproved:	12/16/2022
Closure Report Rec	ceived:					Report App	roved:	12/10/2022
Compositional Ana		nd/or Flared Natural	Gas ———					
Cause	Source Material	V. Unk. Released	olume Recovered	Lost	Units			
Equipment Failure	Separator Crude Oil	5	0	5	BBL			

SIGN-IN HELP

Hearing Fee Application

Operator Data

Searches

	·
9/15/2022	1RP-4590 has been closed. Please refer to incident #NOY1704029358 for all future correspondence.
9/15/2022	The C-141 closure report submitted on 11/10/2021 states "The release is located on top of a historical pit area. Remediation activities will be addressed at time of pit reclamation." If the pit has been reclaimed please provide a closure report including information regarding the remediation of the release. If the pit has not been reclaimed and a deferral request needs to be submitted, page 5 of the C-141 must be completed. A deferral will only be approved if all conditions are met per 19.15.29 NMAC.
9/15/2022	Please submit a revised closure report or deferral request though the OCD permitting portal by 12/16/2022.
09/15/2022	Please include a scaled diagram that shows the potentially impacted area, significant surface features including roads and site infrastructure, location of borings, sample points, monitoring wells and subsurface features such as known pipelines to the extent known at the time of submittal including the source of information regarding subsurface features.
9/15/2022	An application [61120] was submitted to OCD for review. It was submitted, indicating that it was an: [C-141] Application for administrative approval of a release notification and corrective action The operator was emailed confirmation of this event.
11/10/2021	The (09/15/2022, C-141) application [61120] was assigned to this incident.
2/09/2017	1RP-4590. Lost supply to separator. Mist over pasture. Location is south of battery, SE of well. Lat/long: 32. 385229, -103. 48183.

Orders				
RP-4590-0				O,
Applicant:	[49915] BTA OIL PROD & SUN OF	PER LTD PART		
Contact:		Approved By:		
Reviewer:	Olivia Yu	Issuing Office:	Hobbs	
rocessing Dates				
Received:	01/23/2017	Ordered:	02/09/2017	
Approved:	02/09/2017	Denied:		
Expiration:		Cancelled:		

New Mexico Energy, Minerals and Natural Resources Department | Copyright 2012 1220 South St. Francis Drive | Santa Fe, NM 87505 | P: (505) 476-3200 | F: (505) 476-3220

EMNRD Home OCD Main Page OCD Rules Help

From: Bob Hall <BHall@btaoil.com>

Sent: Thursday, September 15, 2022 3:09 PM

To: Bob Hall

Subject: FW: The Oil Conservation Division (OCD) has rejected the application, Application ID: 61120

From: OCDOnline@state.nm.us < OCDOnline@state.nm.us >

Sent: Thursday, September 15, 2022 10:26 AM

To: Bob Hall <BHall@btaoil.com>

Subject: The Oil Conservation Division (OCD) has rejected the application, Application ID: 61120

***** EXTERNAL EMAIL - Please use caution and **<u>DO NOT</u>** open attachments or click links from unknown or unexpected emails. *****

To whom it may concern (c/o Bob Hall for BTA OIL PRODUCERS, LLC),

The OCD has rejected the submitted *Application for administrative approval of a release notification and corrective action* (C-141), for incident ID (n#) nOY1704029358, for the following reasons:

- Please include a scaled diagram that shows the potentially impacted area, significant surface features
 including roads and site infrastructure, location of borings, sample points, monitoring wells and subsurface
 features such as known pipelines to the extent known at the time of submittal including the source of
 information regarding subsurface features.
- The C-141 closure report submitted on 11/10/2021 states "The release is located on top of a historical pit
 area. Remediation activities will be addressed at time of pit reclamation." If the pit has been reclaimed please
 provide a closure report including information regarding the remediation of the release. If the pit has not
 been reclaimed and a deferral request needs to be submitted, page 5 of the C-141 must be completed. A
 deferral will only be approved if all conditions are met per 19.15.29 NMAC.
- Please submit a revised closure report or deferral request though the OCD permitting portal by 12/16/2022.
- 1RP-4590 has been closed. Please refer to incident #NOY1704029358 for all future correspondence.

The rejected C-141 can be found in the OCD Online: Permitting - Action Status, under the Application ID: 61120. Please review and make the required correction(s) prior to resubmitting.

If you have any questions why this application was rejected or believe it was rejected in error, please contact me prior to submitting an additional C-141.

Thank you, Brittany Hall Environmental Specialist - A 505-334-6178 Brittany.Hall@state.nm.us

New Mexico Energy, Minerals and Natural Resources Department 1220 South St. Francis Drive Santa Fe, NM 87505



APPENDIX F

Final C-141

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesta, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico Energy Minerals and Natural Resources

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Form C-1 Revised March 17, 1 Submit 2 Copies to appropri

Submit 2 Copies to appropri District Office in accorda with Rule 116 on b side of fc

Release Notification and Corrective Action

Name of Company BTA Oil Producers LLC					OPE	RATOR		✓ Initial Repo	rt 🗌 Fin	al Report
Facility Name Grama 8817 JV-P Federal Com #2H 30-025-43426 32.385229,-103.481830 Surface Owner State of NM Mineral Owner LOCATION OF RELEASE Unit Letter Section 16 22S NATURE OF RELEASE Type of Release Minor Notine of Release Minor Notine of Release NATURE OF RELEASE Type of Release Minor Notine of Release NATURE OF RELEASE Type of Release Minor Notine of Release Feet from the North/South Line Feet from the Last/West Line County West NATURE OF RELEASE Type of Release NATURE OF RELEASE Type of Release NATURE OF RELEASE Type of Release Notine of Release S BO Volume Recovered O Date and Hour of Occurrence Date and Hour of Discovery 4:50 pm 1/11/2017 4:50 pm 1/11/2017 If YES, To Whom? Olivia Yu - NMOCD Carlsbad BLM, Shelly Tucker Date and Hour S:30 pm 1/11/2017 If YES, To Whom? Olivia Yu - NMOCD Carlsbad BLM, Shelly Tucker Date and Hour S:30 pm 1/11/2017 If YES, Volume Impacting the Watercourse. RECEIVED By Olivia Yu at 7:58 am, Feb 09, 2017 Describe Cause of Problem and Remedial Action Taken.* Lost supply to the separator, released fine mist of oil from top of separator. Some of the mist drifted to the pasture directly adjacent to the battery. Will wash and clean with heated water, detergent, and possible bio agent. Will remove any affected soil and dispose of at an approved waste facility. Describe Area Affected and Cleanup Action Taken.* Describe Area Affected and Cleanup Action Taken.* Describe Area Affected and Cleanup Action Taken.* Or Well; ~60 m S of battlery. See above explanation In hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules an regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endange public health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any othe				4410						
Surface Owner State of NM Mineral Owner Lease No. NMNM82799 LOCATION OF RELEASE Unit Letter Section Township Range Feet from the North/South Line Feet from the East/West Line County West NATURE OF RELEASE Type of Release Minor Volume of Release 5 BO Volume Recovered 0 Source of Release release from separator Date and Hour of Occurrence Date and Hour of Discovery 4.50 pm /1/1/2017 4.50 pm /1/1/2017 Was Immediate Notice Given? Yes No Not Required Official Yea North/South Line Watercourse Reached? Yes No If a Watercourse Reached? Yes No If a Watercourse was Impacted, Describe Fully.* N/A Describe Cause of Problem and Remedial Action Taken.* Lost supply to the separator, released fine mist of oil from top of separator. Some of the mist drifted to the pasture directly adjacent to the battery. Will wash and clean with heated water, detergent, and possible bio agent. Will remove any affected soil and dispose of at an approved waste facility. Describe Area Affected and Cleanup Action Taken.* See above explanation I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules an regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endange public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of insponsibility for compliance with any other federal, state, olocal laws and/or regulations. Signature: Pam Inskeep Approved by District Supervisor. Approved by District Supervisor. Approved by District Supervisor. Attached Value Attache										
LOCATION OF RELEASE Unit Letter Section Township Range Feet from the South South						Facility Typ	pe O/G batt	ery		
Unit Letter Section Township Range Feet from the South Sou	Surface Owner S	tate of NM		Mineral	Owner			Lease	No. NMNM	182799
NATURE OF RELEASE Type of Release				LOCATI	ON (OF RELEA	ASE			
Type of Release										
Source of Release release from separator				NATUE	RE O	F RELEAS	SE			
As 50 pm 1/11/2017 As 50 pm 1/11/2017 As 50 pm 1/11/2017	Type of Release	Minor				Volume of	f Release 5 BO	Volume	Recovered	0
Was Immediate Notice Given? Yes No Not Required Olivia Yu - NMOCD Carlsbad BLM, Shelly Tucker	Source of Release	release fr	rom separa	ator					very	
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Was a Watercourse Reached? Yes No If a Watercourse was Impacted, Describe Fully.* N/A Describe Cause of Problem and Remedial Action Taken.* Lost supply to the separator, released fine mist of oil from top of separator. Some of the mist drifted to the pasture directly adjacent to the battery. Will wash and clean with heated water, detergent, and possible bio agent. Will remove any affected soil and dispose of at an approved waste facility. Describe Area Affected and Cleanup Action Taken.* Describe Area Affected and Cleanup Action Taken.* See above explanation I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules an regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endange public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liabilishould their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human he of the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. OIL CONSERVATION DIVISION Signature: Pam Inskeep Pam Inskeep Approved by Bistriet Supervisor. Approved by Conditions of Approval: Attached Atta			еер			Date and I	Hour 5:30 pm 1	/11/2017		
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Signature: Pam Inskeep Approved by District Supervisor: Approval Date: 01/13/2017 Phone: (432) 682-3753 OIL CONSERVATION DIVISION Approved by District Supervisor: Approval Date: 2/9/2017 Expiration Date: Conditions of Approval:	regulations all operat public health or the e should their operation or the environment.	ors are required to nvironment. The as have failed to a In addition, NMC	o report are acceptant adequately OCD accep	nd/or file certain the of a C-141 reprinted investigate and	release ort by t remedia	notifications a he NMOCD mate contaminat	nd perform corre- narked as "Final R ion that pose a the re the operator of	ctive actions for r deport" does not r reat to ground wa responsibility for	eleases which m elieve the operat ter, surface wate compliance wit	ay endanger for of liability r, human heal h any other
Printed Name: Pam Inskeep Title: Regulatory Administrator Approval Date: 2/9/2017 Expiration Date: Date: 01/13/2017 Phone: (432) 682-3753 Conditions of Approval:	Signature: Im	u Ond	(cein	,			OIL CON	ISERVATIO	N DIVISION	7
Date: 01/13/2017 Phone: (432) 682-3753 Conditions of Approval: Conditions of Approval:		Pam Inskeep				Approved by	District Superv	iser: U		
Date: 01/13/2017 Phone: (432) 682-3/53 Conditions of Approval:	Title:	Regulatory Ad	ministrato	г		Approval Da	2/9/201	7 Expiratio	n Date:	
Attach Additional Sheets If Necessary see attached directive 1RP-4590						Conditions o	f Approval:		Attached	
	Attach Additional S	heets If Necess	ary				see attach	ed directive	1RP-45	90

nOY1704029358

pOY1704029518

Operator/Responsible Party,

The OCD has received the form C-141 you provided on _1/23/2017__ regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number __1R-__4590_ has been assigned. Please refer to this case number in all future correspondence.

It is the Division's obligation under both the Oil & Gas Act and Water Quality Act to provide for the protection of public health and the environment. Our regulations (19.15.29.11 NMAC) state the following,

The responsible person shall complete <u>division-approved corrective action</u> for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC. [emphasis added]

Release characterization is the first phase of corrective action unless the release is ongoing or is of limited volume and all impacts can be immediately addressed. Proper and cost-effective remediation typically cannot occur without adequate characterization of the impacts of any release. Furthermore, the Division has the ability to impose reasonable conditions upon the efforts it oversees. As such, the Division is requiring a workplan for the characterization of impacts associated with this release be submitted to the OCD District _1_ office in __Hobbs____ on or before _3/9/2017_. If and when the release characterization workplan is approved, there will be an associated deadline for submittal of the resultant investigation report. Modest extensions of time to these deadlines may be granted, but only with acceptable justification.

The goals of a characterization effort are: 1) determination of the lateral and vertical extents along with the magnitude of soil contamination. 2) determine if groundwater or surface waters have been impacted. 3) If groundwater or surface waters have been impacted, what are the extents and magnitude of that impact. 4) The characterization of any other adverse impacts that may have occurred (examples: impacts on vegetation, impacts on wildlife, air quality, loss of use of property, etc.). To meet these goals as quickly as possible, the following items must, at a minimum, be addressed in the release characterization workplan and subsequent reporting:

- Horizontal delineation of soil impacts in each of the four cardinal compass directions. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆), and for chloride by Method 300. This is not an exclusive list of potential contaminants. Analyzed parameters should be modified based on the nature of the released substance(s). Soil sampling must be both within the impacted area and beyond.
- Vertical delineation of soil impacts. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆), and for chloride by Method 300. As above, this is not an exclusive list of potential contaminants and can be modified. Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below these values must be demonstrated as existing above the water table.
- Nominal detection limits for field and laboratory analyses must be provided.
- Composite sampling is not generally allowed.
- Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted

for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation.

- •Probable depth to shallowest protectable groundwater and lateral distance to nearest surface water. If there is an estimate of groundwater depth, the information used to arrive at that estimate must be provided. If there is a reasonable assumption that the depth to protectable water is 50 feet or less, the responsible party should anticipate the need for at least one groundwater monitoring well to be installed in the area of likely maximum contamination.
- If groundwater contamination is encountered, an additional investigation workplan may be required to determine the extents of that contamination. Groundwater and/or surface water samples, if any, must be analyzed by a competent laboratory for volatile organic hydrocarbons (typically Method 8260 full list), total dissolved solids, pH, major anions and cations including chloride and sulfate, dissolved iron, and dissolved manganese. The investigation workplan must provide the groundwater sampling method(s) and sample handling protocols. To the fullest extent possible, aqueous analyses must be undertaken using nominal method detection limits. As with the soil analyses, copies of the actual laboratory results must be provided including chain of custody documentation.
- Accurately scaled and well-drafted site maps must be provided providing the location of borings, test pits, monitoring wells, potentially impacted areas, and significant surface features including roads and site infrastructure that might limit either the release characterization or remedial efforts. Field sketches may be included in subsequent reporting, but should not be considered stand-alone documentation of the site's layout. Digital photographic documentation of the location and fieldwork is recommended, especially if unusual circumstances are encountered.

Nothing herein should be interpreted to preclude emergency response actions or to imply immediate remediation by removal cannot proceed as warranted. Nonetheless, characterization of impacts and confirmation of the effectiveness of remedial efforts must still be provided to the OCD before any release incident will be closed.

Jim Griswold

OCD Environmental Bureau Chief 1220 South St. Francis Drive Santa Fe, New Mexico 87505 505-476-3465 jim.griswold@state.nm.us

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Incident ID	nOY1704029358	
District RP		
Facility ID		
Application ID		

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	<u>>100</u> (ft bgs)			
Did this release impact groundwater or surface water?	☐ Yes ⊠ No			
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes ⊠ No			
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	☐ Yes ⊠ No			
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ⊠ No			
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	☐ Yes ⊠ No			
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ⊠ No			
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ⊠ No			
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ⊠ No			
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ⊠ No			
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes ⊠ No			
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ⊠ No			
Did the release impact areas not on an exploration, development, production, or storage site?	X Yes ☐ No			
Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vercontamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.	rtical extents of soil			
Characterization Report Checklist: Each of the following items must be included in the report.				
 Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells. Field data Data table of soil contaminant concentration data Depth to water determination Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release Boring or excavation logs Photographs including date and GIS information 				

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

☐ Laboratory data including chain of custody

☐ Topographic/Aerial maps

Form C-141

Page 4

State of New Mexico Oil Conservation Division

Incident ID	nOY1704029358
District RP	
Facility ID	
Application ID	

regulations all operators are required to report and/or file certain relepublic health or the environment. The acceptance of a C-141 report failed to adequately investigate and remediate contamination that po	te to the best of my knowledge and understand that pursuant to OCD rules and ease notifications and perform corrective actions for releases which may endanger by the OCD does not relieve the operator of liability should their operations have use a threat to groundwater, surface water, human health or the environment. In cerator of responsibility for compliance with any other federal, state, or local laws
Printed Name: Bob Hall	Title: Environmental Manager
Signature: Bol Half	Date: 2/14/2023
email: bhall@btaoil.com	Telephone: 432-682-3753
OCD Only	
Received by:Jocelyn Harimon	Date: _02/14/2023

Form C-141 Page 6

State of New Mexico Oil Conservation Division

Incident ID	nOY1704029358
District RP	
Facility ID	
Application ID	

Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

Closure Report Attachment Checklist: Each of the following item	is must be included in the closure report.
☐ A scaled site and sampling diagram as described in 19.15.29.11 N	JMAC
Photographs of the remediated site prior to backfill or photos of must be notified 2 days prior to liner inspection)	the liner integrity if applicable (Note: appropriate OCD District office
☐ Laboratory analyses of final sampling (Note: appropriate ODC D	ristrict office must be notified 2 days prior to final sampling)
☐ Description of remediation activities	
Signature: Blifalf Date:	elease notifications and perform corrective actions for releases which C-141 report by the OCD does not relieve the operator of liability liate contamination that pose a threat to groundwater, surface water, c-141 report does not relieve the operator of responsibility for ns. The responsible party acknowledges they must substantially tions that existed prior to the release or their final land use in
OCD Only	Date: 02/14/2023
Received by: Jocelyn Harimon	Date: 02/14/2023
	liability should their operations have failed to adequately investigate and ter, human health, or the environment nor does not relieve the responsible regulations.
Closure Approved by: Juttany Hall	Date:2/20/2023
Printed Name: Brittany Hall	Title: Environmental Specialist

District I
1625 N. French Dr., Hobbs, NM 88240
Phone: (575) 393-6161 Fax: (575) 393-0720

District II 811 S. First St., Artesia, NM 88210 Phone:(575) 748-1283 Fax:(575) 748-9720

District III 1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170

1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. **Santa Fe, NM 87505**

CONDITIONS

Action 186250

CONDITIONS

Operator:	OGRID:
BTA OIL PRODUCERS, LLC	260297
104 S Pecos	Action Number:
Midland, TX 79701	186250
	Action Type:
	[C-141] Release Corrective Action (C-141)

CONDITIONS

Create: By		Condition Date
bhall	None	2/20/2023